

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EMMA KOE et al.,

*Plaintiffs,*

v.

CAYLEE NOGGLE et al.,

*Defendants.*

Case No. \_\_\_\_\_

**DECLARATION OF PAUL VOE**

I, Paul Voe,<sup>1</sup> hereby declare and state as follows:

1. I am over the age of eighteen, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to those facts if called to do so.
2. I am a Plaintiff in this Action and father of a transgender child, Mia.

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<sup>1</sup> Because of concerns about my child's privacy and safety, I am seeking to proceed in this case under a pseudonym. *See Motion to Proceed Pseudonymously*, filed concurrently herewith. In addition, contemporaneous with signing this declaration, I have signed with my legal name a separate copy of this declaration. My attorneys have a copy of that separate declaration.

3. Mia's mother and I were married for sixteen years. We are currently separated and in the process of divorcing. We have a court order for joint legal custody that provides me with decision-making authority. We have two children who we love and support. We make decisions in the best interest of our children, including medical decisions.
4. Our older child is thirteen years old. Mia is eleven years old. Mia is a girl who is transgender and whose natal sex was male.
5. Georgia has been our home for the past nine years. Mia and her brother currently live with me in Athens, where I work as an executive at a global medical technology company. Mia's mother also lives in Athens. Our children have spent most of their lives in Georgia.
6. Mia is a strong, opinionated, and smart little girl. She knows who she is and what she wants. She is very social and has a lot of friends at school. She is a voracious reader and enjoys learning about Greek mythology. She also loves playing the piano.
7. As early as eighteen months old, Mia would identify with the girl characters on television, like Dora the Explorer, Elsa from the movie Frozen, and the pink Power Ranger. I can't even think of a male character that she has ever identified with.

8. Mia started to express that she is a girl and use she/her pronouns at home when she was two and a half years old.
9. When she started pre-kindergarten, kids would go around saying whether they were a boy or girl. She would say “I’m a girl.” She never wavered in her conviction that she is a girl even when the other kids would tell her that she was a boy.
10. When Mia was five years old, her mother and I met with a psychologist in Atlanta. The psychologist asked questions about whether Mia consistently identified as a girl, how long she had done so, how insistent she was about being a girl, and whether she ever expressed doubts. We explained that she had always identified as a girl and had never wavered in her insistence that she was a girl. The psychologist said that we could give Mia a choice between girl and boy clothes.
11. Once we gave her a choice, Mia picked girl clothes every time. I remember seeing a giant smile on her face when she first put on her new girl clothes. Although at first we provided options, we eventually realized there was no point in continuing to offer her boy clothes.
12. I did not know much about the LGBTQ+ community at the time, but I knew I wanted to support my child. I joined an LGBTQ+ resource group and

allyship training at the company where I work. My family also joined the Athens chapter of PFLAG, an organization dedicated to supporting, educating, and advocating for LGBTQ+ people and their families. We joined an LGBTQ+ kids' playgroup. These resources helped us navigate how to affirm and support Mia.

13. Mia's perspective was this is who I am, I'm a girl; we, as parents, just needed to see it. She has been living as a girl ever since pre-kindergarten. Mia's mother and I have been advocating and fighting for her every step of the way. Mia's brother is also supportive and affirming.
14. Once Mia could express her female gender, I witnessed a huge improvement in her mental health. She became more outgoing and now has lots of friends. She also became more confident and open. For example, I don't know if Mia would have been able to perform at her piano recital in front of forty people without the confidence she currently has in being her true self.
15. When Mia was around seven years old, she told us that she wanted to change her name. She chose a name and we have been calling her by that name ever since. After a couple of years, we legally changed her name when Mia remained unwavering.

16. In 2018, Mia's mother and I started discussing the idea of Mia seeing an endocrinologist. Mia started annual visits with an endocrinologist in Atlanta in 2021. The endocrinologist has been monitoring Mia's hormone levels. We understand that puberty typically begins between ages eight and thirteen. Mia is now eleven, and according to her most recent laboratory work, she has not yet begun puberty. Once she starts puberty, her recommended treatment plan includes puberty blockers and hormone therapy. Mia, her mother, and I will make this decision in consultation with her providers.
17. In 2020, Mia started seeing her current psychologist in Athens. The psychologist diagnosed Mia with gender dysphoria and provides support for her as a result of this condition. She has been seeing this psychologist one to two times a month for the majority of the past three years.
18. S.B. 140 would restrict my ability to access gender-affirming health care for my daughter. Watching S.B. 140 move through the legislature was unbelievably stressful. It felt like an attack on my daughter and her health and well-being. As a parent, I strive to keep my children healthy and happy. Because of S.B. 140, I have lost sleep and gained weight from the stress, and it has taken a toll on my mental health.

19. I worry about the effects on my daughter if she is not able to pursue her treatment plan and access gender-affirming health care. When Mia looks at pictures of herself pre-transition, she has a negative physical reaction. She does not want to see herself at that time. She won't even look at old artwork that displays her old name. She does not want any ornaments with her old name on the Christmas tree. Mia knows who she is and that that was not her.
20. I have seriously considered moving because of S.B. 140 in order to be able to care for my child. But Georgia is our home and where my children have friends, community, and a support system. I do not want to uproot my family, and Mia's mother lives in Georgia, so my ability to relocate is complicated.
21. SB 140 is an outrageous attack on my child who is simply trying to be her true and authentic self. This law deprives me of my right to ensure my daughter receives appropriate, evidence-based medical care as soon as such care is necessary to avoid or alleviate suffering. As a father, I am afraid of both the immediate and longstanding effects this lack of care will have on my child.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of June 2023.

Respectfully Submitted,

A handwritten signature in black ink that reads "Paul Voe". The signature is written in a cursive style with a horizontal line underneath it.

Paul Voe